

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
)	
Plaintiffs and)	C.A. No. 20-613 (SB)
Counterdefendants,)	
)	REDACTED - PUBLIC VERSION
v.)	Original filing date: January 30, 2023
)	Redacted filing date: February 6, 2023
ROSS INTELLIGENCE INC.,)	
)	
Defendant and)	
Counterclaimant.)	

**DECLARATION OF MIRANDA D. MEANS IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO ROSS INTELLIGENCE INC.’S
MOTIONS FOR SUMMARY JUDGMENT**

I, Miranda D. Means, Esq., declare as follows:

1. I am an attorney at the law firm of Kirkland & Ellis LLP, counsel of record for Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH (“Thomson Reuters”) and West Publishing Corporation (“West”) (collectively, “Plaintiffs”). I am admitted and in good standing to practice law in the states of Massachusetts and New York, and I am admitted *pro hac vice* to practice in this District for the above-captioned case. I submit this declaration in support of Plaintiffs’ Opposition to ROSS Intelligence Inc.’s Motions for Summary Judgment on Tortious Interference with Contract and Fair Use. The statements set forth in this declaration are based on my personal knowledge and my review of the contemporaneous documents referenced and attached hereto.

2. On September 1, 2022, L. Karl Branting, J.D., Ph.D., executed a rebuttal expert report in this case. A true and correct copy of this report is attached as **Exhibit 104**.

3. On October 10, 2022, Dr. Jonathan L. Krein executed a reply expert report for this case. A true and correct copy of this report is attached as **Exhibit 105**.

4. Attached hereto as **Exhibit 106** is a true and correct copy of excerpts from the deposition of Richard A. Leiter, held on October 24, 2022.

5. Attached hereto as **Exhibit 107** is a true and correct copy of excerpts from the deposition of Thomas Leighton, held on April 5, 2022.

6. Attached hereto as **Exhibit 108** is a true and correct copy of excerpts from the deposition of Jonathan Krein, held on October 22, 2022.

7. Attached hereto as **Exhibit 109** is a true and correct copy of excerpts from the deposition of Tomas van der Heijden, held on March 17, 2022.

8. Attached hereto as **Exhibit 110** is a true and correct copy of the document produced in this litigation with beginning bates TR-0179847.

9. Attached hereto as **Exhibit 111** is a true and correct copy of the document produced in this litigation with beginning bates ROSS-010128683.

10. Attached hereto as **Exhibit 112** is a true and correct copy of the document produced in this litigation with beginning bates TR-0802088.

11. Attached hereto as **Exhibit 113** is a true and correct copy of the document produced in this litigation with beginning bates TR-0743443.

12. Attached hereto as **Exhibit 114** is a true and correct copy of the document produced in this litigation with beginning bates TR-0562422.

13. Attached hereto as **Exhibit 115** is a true and correct copy of the document produced in this litigation with beginning bates TR-0894151.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 30th day of January, 2023.



Miranda D. Means